

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JEFFREY M. NORMAN,

Plaintiff,

V.

DAVID W. ELKIN, RICHARD M. SHORIN
and THE ELKIN GROUP, INC.

Defendants,

and

US MOBILCOMM, INC.,

Nominal Defendant.

C.A. No. 06-005-JJF

Jury Trial Demanded

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiff Jeffrey M. Norman will take the deposition upon oral examination of the designee(s) of Defendant The Elkin Group, Inc. on the areas identified on Exhibit A attached hereto.

The deposition will take place at the offices of Blank Rome and will commence on **December 7, 2006 at 3:00 p.m.**, or at such other time before December 22, 2006 as the parties mutually agree, before an officer authorized by law to administer oaths. The deposition will continue from day to day thereafter until completed, it will be recorded by stenographic means and may be videotaped. You are invited to attend and examine the witness.

Dated: December 6, 2006

/s/ Sean J. Bellew

Sean J. Bellew (#4072)

David A. Felice (#4090)

Cozen O'Connor

1201 North Market Street, Suite 1400

Wilmington, DE 19801

Telephone: (302) 295-2000

Facsimile: (302) 295-2013

Attorneys for Plaintiff Jeffrey M. Norman

Exhibit A

Subject Areas:

1. All Federal Communications Commission ("FCC") licenses owned or at one time owned by The Elkin Group, Inc. ("TEG").
2. All costs associated with the purchase, trade, bid or other acquisition of the FCC licenses by TEG.
3. Alleged payment by TEG of any "upfront payment" or other deposit with the FCC for Auction Nos. 18 and/or 24.
4. All revenue derived from the sale, transfer, cancellation or other disposition of TEG's FCC licenses.
5. The distribution of the net profits derived from the sale, transfer, cancellation or other disposition of TEG's FCC licenses.
6. All agreements (written, oral or implied) with US Mobilcomm, Inc. ("USM") concerning FCC licenses.
7. All communications with Richard Shorin that refer or relate to TEG's purchase, trade, bid or other acquisition of the FCC licenses by TEG as well as the sale, transfer, cancellation or other disposition of TEG's FCC licenses.
8. All communications with David Elikin that refer or relate to TEG's purchase, trade, bid or other acquisition of the FCC licenses by TEG as well as the sale, transfer, cancellation or other disposition of TEG's FCC licenses.
9. Any and all communications or documents that refer or relate to TEG's participation in FCC Phase 2 Auction Nos. 18 and/or 24.
10. All other FCC auctions or lotteries to which TEG was a participant.
11. All TEG communications with the FCC that refer or relate to applications, exchanges, transfers, cancellations or other activities tending to effect a legal interest in a FCC license.
12. All communications with Roamer One, Inc.
13. All communications with Repeater Network Spectrum Aq., Inc.

CERTIFICATE OF SERVICE

I, Sean J. Bellew, do hereby certify that on December 6, 2006, I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing to the following counsel of record:

Steven L. Caponi, Esquire
Blank Rome LLP
1201 N. Market Street, Suite 800
Wilmington, DE 19801

/s/ Sean J. Bellew
Sean J. Bellew (#4072)